

RQ-2

June 30, 2020

KIM LUTZ, TREASURER HUMANITY FORWARD FUND 1787 TRIBUTE ROAD, SUITE K SACRAMENTO, CA 95815

Response Due Date 08/04/2020

IDENTIFICATION NUMBER: C00712497

REFERENCE: AMENDED FEBRUARY MONTHLY REPORT (01/01/2020 - 01/31/2020), RECEIVED 04/20/2020

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 4 item(s):

- 1. Schedule E for Line 24 of your report discloses MEMO entries for apparent independent expenditures made on behalf of Andrew Yang during this reporting period. However, a Schedule D supporting Line 10 has not been provided. Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report to clarify this apparent discrepancy. (11 CFR §104.4)
- 2. Your committee filed 48-hour reports informing the Commission of independent expenditures made in support or opposition of federal candidates with "Cohen, Lawrence", "Cohen, Seth Adam", "Yang Collective", and "Card Services Center" as the payees. However, the amounts and dates of public dissemination disclosed on these reports do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 48-hour reports supporting independent expenditures not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these reports. (11

HUMANITY FORWARD FUND

Page 2 of 3

CFR §104.4)

- 3. Schedule E of your report indicates that your committee may have failed to file and timely file one or more of the required 48 hour reports for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. (11 CFR §104.3(b))
- filed Your committee has a 48-hour report for independent expenditure supporting Andrew Yang (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 48-hour reports must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction. (11 CFR §104.4)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For information about the report

HUMANITY FORWARD FUND

Page 3 of 3

review process or specific filing information for your committee type, please visit www.fec.gov/help-candidates-and-committees. For more information about Requests for Additional Information (RFAI), why you received a letter, and how to respond, please visit www.fec.gov/help-candidates-and-committees/request-additional-information. Should you have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number(202) 694-1173.

Sincerely,

3.M6

Kevin McQueen

Senior Campaign Finance Analyst

Reports Analysis Division

329

Late 48 Hour Report (Schedule E) Humanity Forward Fund (C00712497)

Name of Payee	Dissemination Date	Amount	Candidate	Election	Report Received
				P2020 - IA, CA, FL,	
Cohen, Seth Adam	1/21/20	\$600.00	Yang, Andrew	TX, OH	3/1/20
Card Services				P2020 - IA, CA, FL,	
Center	1/27/20	\$290.00	Yang, Andrew	TX, OH	3/1/20
				P2020 - IA, CA, FL,	
Cohen, Seth Adam	1/31/20	\$420.25	Yang, Andrew	TX, OH	3/1/20
Card Services				P2020 - IA, CA, FL,	
Center	1/31/20	\$1,869.16	Yang, Andrew	TX, OH	3/1/20
Adams Outdoor				P2020 - IA, CA, FL,	
Advertising	1/31/20	\$18,380.00	Yang, Andrew	TX, OH	3/1/20
				P2020 - IA, CA, FL,	
Cohen, Lawrence	1/31/20	\$20,000.00	Yang, Andrew	TX, OH	3/1/20

Missing 48 Hour Report (Schedule E) Humanity Forward Fund (C00712497)

Name of Payee	Dissemination Date	Amount	Candidate	Election
Ashby & Gabriel	1/27/20	\$290.00	Yang, Andrew	P2020 - IA, CA, FL, TX, OH

Missing Schedule E (48 Hour Report) Humanity Forward Fund (C00712497)

Name of Payee	Dissemination Date	Amount	Candidate	Election
Card Services Center	1/31/20	\$1,869.16	Yang, Andrew	P2020 - IA, CA, FL, TX, OH